

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,
AMAZON.COM SERVICES LLC, a Delaware
limited liability company, and AMAZON
TECHNOLOGIES, INC., a Nevada corporation,

Plaintiffs,

V.

Does 1-20, unknown parties doing business as "REKK," and the following individuals: Oscar Pineda, Janiyah Alford, Noah Page, Skylar Robinson, William Walsh, Luke Colvin, Alejandro Taveras, Andrew Ling, Brandon Sukhram, Charalampos Gkatzoulas, Cosmin Sopca, Dylan Hinz, Eric Niezabytowski, Graham Ferguson, Ivona Brazovskaja, James Garofalo, Jenny Tran, Johanes Kessel, Jorge Correa, Josh Davis, Karcper Niepogoda, Olaf Booij, Ryan Bates, Sai Charan Beeravelli, Simone Antonio Figura, Zachary Iguelmamene, and Zoha Ahmed,

Defendants.

STIPULATION

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies, Inc. (together, “Amazon”), and Defendant Kacper Niepogoda (“Niepogoda”) and (collectively “Settling Parties”), by and through Amazon’s respective counsel of record and by Niepogoda’s

**STIPULATED PERMANENT INJUNCTION
AS TO DEFENDANT NIEPOGODA (23-cv-01879-JLR) - 1**

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main • 206.757.7700 fax

1 pro-se representation, notify the Court that the Settling Parties have reached a settlement of all
2 claims between them in this matter. Pursuant to the terms of that settlement, the Settling Parties
3 stipulate and agree to entry of the permanent injunction below.

4 //

5 //

6 //

7 //

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

STIPULATED PERMANENT INJUNCTION
AS TO DEFENDANT NIEPOGODA (23-cv-01879-JLR) - 2

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main · 206.757.7700 fax

1 DATED this 9th day of April, 2024.

2
3 Davis Wright Tremaine LLP
4 Attorneys for Plaintiffs

5 By s/Melina Garcia
6 Bonnie MacNaughton, WSBA #36110
7 Tim Cunningham, WSBA #50224
8 Melina Garcia, WSBA #58036
9 920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Phone: 206-622-3150
Fax: 206-757-7700
Email: bonniemacnaughton@dwt.com
timcunningham@dwt.com
melinagarcia@dwt.com

Defendant

DocuSigned by:
By s/ Kacper Niepogoda
Kacper Niepogoda
Phone: +31641896401
Email: kacperni@icloud.com

11
12
13 **PERMANENT INJUNCTION**

14 Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that
15 Defendant Kacper Niepogoda, and his respective employees, agents, successors and assigns, and
16 all others in active concert or participation with him, are permanently enjoined and restrained
17 from:

- 18 1. Accessing and using, whether directly or indirectly via a third party, intermediary,
19 or proxy, Amazon.com, or any other Amazon online store around the world;
- 20 2. Exploiting or abusing Amazon's ordering or return services;
- 21 3. Making false statements or misrepresentations to Amazon;
- 22 4. Engaging in any activity that defrauds Amazon into paying money or providing
23 replacement products for illegitimate returns;
- 24 5. Engaging in any scheme or malicious activity that interacts with Amazon; and
- 25 6. Knowingly and materially assisting or engaging any other person or business
26 entity in engaging in or performing any of the activities listed above.

27
STIPULATED PERMANENT INJUNCTION
AS TO DEFENDANT NIEPOGODA (23-cv-01879-JLR) - 3

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main · 206.757.7700 fax

The Court shall retain continuing jurisdiction over this matter for the limited purposes of enforcing the terms of the Settling Parties' settlement agreement and this Stipulated Permanent Injunction.

IT IS SO ORDERED.

DATED: April 12, 2024.



The Honorable James L. Robart
UNITED STATES SENIOR DISTRICT JUDGE

**STIPULATED PERMANENT INJUNCTION
AS TO DEFENDANT NIEPOGODA (23-cv-01879-JLR) - 4**

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main • 206.757.7700 fax